

1 [Submitting Counsel below]

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6 IN THE UNITED STATES DISTRICT COURT

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8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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10 IN RE: UBER TECHNOLOGIES, INC.,
11 PASSENGER SEXUAL ASSAULT
12 LITIGATION

13 This Document Relates to:

14 ALL CASES

15 Case No. 23-md-03084-CRB

16 **ADMINISTRATIVE MOTION TO
17 CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

18 **TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

19 Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether certain
20 material should be sealed. Plaintiffs file these materials under seal because they contain materials
21 previously filed under seal by Uber.

22 **Material To Be Filed Under Seal**

23 The materials to be filed under seal are attachments to Plaintiffs' Reply in Support of their
24 Motion to Compel Custodial Discovery, which contain materials previously filed under seal by
25 Uber. Thus, Plaintiffs request the Court consider whether the following should be filed under
26 seal:
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Document	Description	Designating Party
Exhibit A to Reply In Support of Motion to Compel Custodial Discovery	Chart previously filed under seal by Uber	Uber
Exhibit B to Reply In Support of Motion to Compel Custodial Discovery	Chart previously filed under seal by Uber	Uber

1 Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish
2 that all of the designated material is sealable, and must “file a statement and/or declaration as
3 described in subsection (c)(1)” of the Local Rules. None of the information at issue was
4 marked confidential by Plaintiffs.

5 This motion complies with Civil Local Rule 7-11 and 79-5, and the following
6 attachments accompany this motion:

- 7 1. The Declaration of Roopal P. Luhana in Support of this Motion; and
8 2. A Proposed Order that lists in tabular format all material sought to be sealed.

9 Dated: September 17, 2024

Respectfully submitted,

10 By: /s/ Roopal P. Luhana

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28 *Co-Lead Counsel for Plaintiffs*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 17, 2024, I electronically filed the foregoing document
3 with the Clerk of the Court using the CM/ECF system, which will automatically send notification
4 of the filing to all counsel of record.

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7 By: /s/ Roopal P. Luhana
8 Roopal P. Luhana
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